

FILED

JAN 14 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

Proposed Plaintiff-Intervenor

ADESIJUOLA OGUNJOBI

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA

Case No. 3:20-cv-07811-RS

PLAINTIFFS,

**ADESIJUOLA OGUNJOBI'S
OPPOSITION TO ROSS WILLIAM
ULBRICHT TO CLAIM ASSETS
AND MOTION TO DISMISS**

V.

Approximately 69,370 Bitcoin (BTC),
Bitcoin Gold (BTG),
Bitcoin SV (BSV), and Bitcoin Cash (BCH)
seized from 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbh,

DEFENDANTS.

**ADESIJUOLA OGUNJOBI'S OPPOSITION TO ROSS WILLIAM
ULBRICHT TO CLAIM ASSETS AND MOTION TO DISMISS**

On December 30, 2020, Ross William Ulbricht via his counsels filed Notice of Motion and Motion for Enlargement of Time To File Notice of a Claim or Otherwise Respond to Plaintiff's Amended Civil Complaint and Memorandum of Authorities including Declaration of David Warrington with this court.

Adesijuola Ogunjobi, Plaintiff-Intervenor is filing his own opposition to Ross William Ulbricht to file notice to claim assets and motion to dismiss because Ross William Ulbricht has lost his constitutional right to file claim on the assets seized under forfeiture lawsuit pursuant to 18 U.S.C. §§ 981(a)(1)(A), 981(a)(1)(C), 981(b), and 21 U.S.C. § 881(a)(6), respectively.

It is time for this court, DOJ officials, and counsels for Ross William Ulbricht to allow Ross William Ulbricht to move on with his life and be productive as an inmate of Federal Bureau of Prisons. This is a fantasy for Ross Ulbricht to think United States will hand over almost over \$1 billion in assets. Ross Ulbricht has exhausted all legal resources to be free and will serve the rest of his natural life incarcerated based on the guidelines sentencing due to murder for hire allegations which was never prosecuted but introduced during the trial which the judge later cited as the reason for double life sentences. The attorneys representing him will be paid under **DEPARTMENT OF JUSTICE GUIDELINES** under **ATTORNEYS FEE FORFEITURE GUIDELINES 9-120.00** supporting such acceptance to represent Ross Ulbricht because obviously, the inmate has no such money to pay attorney's fees, however, that's actually the bases of the opposition and motion to dismiss because his attorneys are getting paid to prosecute a claim that's has no remote possibility to be successful and futile.

I was served this notice via mail and sent email to Rebecca Wilson and David Warrington that they're welcome to join the legal team to prosecute the class action in Virginia which the pay will be significant. So, my opposition and motion to dismiss is not a total loss for the counsels for Ross Ulbricht.

I understand Ross Ulbricht's fantasy and need to connect with the outside world, but there are other ways to do so which one of them is relatives are allowed to visit him. Correspondences to pen pals are also allowed. He can teach other inmates to get diplomas, etc.

Due to my position as Plaintiff-Intervenor who has submitted \$2.5 billion in cash offer to acquire those seized assets for one of the entities formed under Toks' \$100 Quadrillion all stock tax free global transaction (not for my personal use) which \$25,000,000 loan has been secured and awaiting any ruling by the court to allow 3,083 bitcoins to be transferred to serve as "collateral" to use the fund to start the process to prosecute the COVID-19 class action fraud case and all the agenda outlined to the public via the website at www.toksbancoportal.com such endeavor's status outweighs the trial of Ross Ulbricht claim to assets seized under the forfeiture lawsuit filed by the United States.

The COVID-19 scam is disrupting all areas of businesses including courts' operations (criminal or civil), and the class action lawsuit to declare COVID-19 a hoax will hopefully put things back to normal and such task is more important than feeding a convict's fantasy of attorneys fighting for his rights which their fees will be guaranteed under the attorneys fee forfeiture guidelines. This claim is futile, period. If DOJ would oppose a co-plaintiff's right to pay \$2.5 billion which is egregious and currently I am still contesting such move, what makes Ross Ulbricht and his attorneys think DOJ would allow him to get such assets back? We're talking over \$1 billion worth of assets for an inmate who will be incarcerated for the rest of his natural life.

Ross William Ulbricht was offered a plea deal that would have sentenced him to serve 10 years, but he turned it down because accepting the plea deal would result in forfeiting any assets he acquired during that time. So, his right to go to trial led to conviction and losing those assets along the way because he was convicted.

This is a very important factor for the court to consider here. There's no strong evidence Ross William Ulbricht owns the assets he's filing notice to claim because during his trial a great

deal of people were mentioned to be part of Silk Road website which was shut down by DOJ, DEA, IRS and FBI. Actually, those assets (bitcoins, et al) belonged to others as in customers of Silk Road which gives the owner/operator Ross Ulbricht the opportunity stealing those assets and moved them to separate wallet which could explain why he wanted some people killed because he was threatened to be exposed by the very people that he stole the assets from back then when Silk Road was in operation. Ross Ulbricht engaged on his own blackmail back then to steal other bitcoins of Silk Road's customers operating anonymously in an elaborate blackmail scheme the owner would not be able to contact authorities or retain attorneys to sue to recover the assets due to the customers engaged in criminal activities. But what Ross Ulbricht didn't know is those same customers could reveal his identity to authorities anonymously like authorities getting a tip to unsolved crime from an anonymous caller and he realized that, he employed to get rid of them by soliciting murder-for-hire paying \$700,000 and that was what actually happened. Ross Ulbricht doesn't own these assets. He owned some assets which were disposed by United States Marshals back then way before the trial against him started. Additionally, Ross Ulbricht hoped authorities would not find the wallet(s), but they did and the rest is history.

No offense, if the counsels for Ross Ulbricht wants to generate fees, then they should accept my invitation to become co-counsels with other attorneys in Virginia. But for now, the representation of Ross Ulbricht is just pure fantasy like Donald J. Trump's lawsuits to overturn election results. For the record, I don't care if they decline, but one thing is for sure, this legal representation is BOGUS like COVID-19 scam.

No one knows who own these assets since Silk Road allows customers to operate anonymously and the owners will not risk jail time to disclose their identities. Some are probably incarcerated as well for other unrelated crimes like Ross Ulbricht.

For these reasons, I hereby move to get the court to dismiss Ross William Ulbricht's notice(s) or any further proceedings regarding claim for the assets with prejudice and save the court resources for other litigants and allow the transaction proposed via pending \$2.5 billion cash offer to buy those assets and allow 3,083 bitcoins transferred to account at BlockFi to serve as collateral against the \$25,000,000 (not \$250 million) loan already secured awaiting to be transferred into a corporate account at a commercial bank in Jacksonville, Florida.

Dated: January 11, 2020

Respectfully submitted,

/s/ Adesijuola Ogunjobi

Adesijuola Ogunjobi
10200 Belle Rive Blvd
Bldg 6 #45
Jacksonville, FL 32256

Proposed Plaintiff-Intervenor

C20-7811RS

FILED

JAN 14 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

CERTIFICATE OF SERVICE

I, ADESIJUOLA OGUNJOBI, certify that a true copy hereof of this document RESPONSE TO GOVERNMENT'S OPPOSITION TO SECOND MOTION TO INTERVENE, AND ADESIJUOLA OGUNJOBI'S OPPOSITION AND MOTION TO DISMISS TO ROSS WILLIAM ULBRICHT'S NOTICE OF MOTION AND MOTION FOR AN ENLARGEMENT OF TIME TO FILE NOTICE OF A CLAIM OR OTHERWISE RESPOND TO PLAINTIFFS AMENDED CIVIL COMPLAINT AND MEMORANDUM OF POINTS AND AUTHORITIES filed and mailed via U.S. Mail to the persons listed below on January 11, 2021.

Copies to:

Judge Richard Seeborg
United States District Court For the Northern District of California
Federal Courthouse
Courtroom 3-17th Floor
450 Golden Gate Avenue
San Francisco, CA 94102
Via Mail

David L. Anderson
United States Attorney
United States Attorney's Office for the Northern District of California
Federal Courthouse
450 Golden Gate Avenue
San Francisco, CA 94102
Via Mail

Rebecca L. Wilson
Kutak Rock LLP
5 Park Plaza
Suite 500
Irvine, CA 92614
Via Mail

/s/ Adesijuola Ogunjobi

ADESIJUOLA OGUNJOBI